BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO THE OFFICE OF THE CONSUMER ADVOCATE'S INTERROGATORIES OCA/USPS-T43-3 (December 20, 2001)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatories OCA/USPS-T43-3 to witness Schenk, filed on December 10, 2001. Witness Schenk appeared for oral cross-examination on December 18, 2001, among the first (or "pre-holiday") group of Postal Service witnesses. The period for discovery (other than legitimate follow-up) directed to such witnesses ended under the schedule on November 26, 2001. See Presiding Officer's Ruling No. R2001-1/1 (September 27, 2001), Presiding Officer's Ruling No. R2001-1/9 (November 14, 2001). Interrogatory OCA/USPS-T43-3 is not legitimate follow-up and is therefore untimely.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Man K. McKeyri. Nan K. McKenzie

Attorney

475 L'enfant Plaza West, S.W. Washington, DC 20260-1137 (202)268-3089; Fax –5402 December 20, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 December 20, 2001